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October 21, 2020

VIA ECF

The Honorable Sidney Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Candie Hailey Means v. City of New York, et al.,
Case No. : 17 CV 5374 (SHS) (KNF)

Your Honor:

We represent Plaintiff, Candie Hailey Means in the above-referenced action. I write to provide the Court with the attached case, Lekomtsev v City of New York, 2020 WL 5878258, for the Court's consideration in Plaintiff's pending motion for sanctions against Defendants. The Lekomtsev case is directly on point and was decided on October 2, 2020, after the parties briefings on Plaintiff's motion for sanctions was completed.

Thank you for your consideration.

Sincerely,

THE COCHRAN FIRM

Tracey L. Brown

cc: Steve Stavridis, Esq. (via ECF)